

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, *et al.*,

Plaintiffs,

Notice of Motion
24-CV-

v.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL
SOLUTIONS, LLC), *et al.*,

Defendants.

NOTICE OF MOTION FOR ATTORNEY ADMISSION, PRO HAC VICE

MOTION BY:

Plaintiff the People of the State of
New York, by Letitia James,
Attorney General of the State of New
York.

RELIEF SOUGHT:

Admission of Amanda Bacoyanis,
Lewis Beilin, Kevin Burns, Marion
Quirk, Evan Romanoff, and Lynne
Weaver to the Western District of
New York, Pro Hac Vice

WHEN RETURNABLE:

As directed by the Court

WHERE RETURNABLE:

United States Courthouse
2 Niagara Square
Buffalo, New York 14202

SUPPORTING PAPERS:

Attorney Petitions
Sponsor Affidavits
Oaths
Civility Principles

DATED: Buffalo, New York
January 9, 2024

LETITIA JAMES
Attorney General of the State of
New York

BY:

/s/ Christopher L. Boyd
CHRISTOPHER L. BOYD
Assistant Attorney General
Main Place Tower, Suite 300A
350 Main Street
Buffalo, NY 14202
(716) 853-8457
Christopher.Boyd@ag.ny.gov

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE APPLICATION OF

Lewis W. Beilin

(Name)

TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

TO THE HONORABLE _____,
JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK:

Lewis W. Beilin, petitioner herein, respectfully states:

1. That petitioner has an office for the practice of law at:

Wisconsin Department of Justice, 17 West Main Street, Madison, Wisconsin 53703.

2. That petitioner attended the following educational institutions and received the following degrees:

University of Pennsylvania, B.A.; University of Chicago, M.A., Ph.D.; University of Wisconsin Law School, J.D.

3. Please complete either (a), (b), or (c):

Admission by Petition

(a) That petitioner was admitted to practice by the Appellate Division of the Supreme Court, _____ Department of the State of New York on the _____ day of _____, _____.

Additional Requirements:

Admission Petition Form
Admission Sponsoring Affidavit
Attorney's Oath
Civility Principles Oath
Attorney Database and Electronic Case Filing Registration Form
Check or money order in the amount of the Attorney Admission fee set forth in the District Court Schedule of Fees
(due on upon admission)

Admission by Certificate of Good Standing

(b) That petitioner was admitted to practice in the United States District Court of the _____ District of _____ on the _____ day of _____, _____, and is a member of the bar of the State in which that district court is located and in which the petitioner maintains an office for the practice of law.

Additional Requirements:

Original Certificate of Good Standing from the Clerk of Court of which he or she is a member
(dated no earlier than six months prior to submission to this Court)
Admission Petition Form (when attorney admitted to a District Court outside of New York State)
Attorney's Oath
Civility Principles Oath
Attorney Database and Electronic Case Filing Registration Form
Check or money order in the amount of the Attorney Admission fee set forth in the District Court Schedule of Fees
(due on upon admission)

Pro Hac Vice Admission

(c) That petitioner is admitted to practice in the State of Wisconsin and New York.

Additional Requirements:

Motion to Appear Pro Hac Vice
Admission Petition Form
Admission Sponsoring Affidavit
Attorney's Oath
Civility Principles Oath
Attorney Database and Electronic Case Filing Registration Form
Check, money order, or payment of fee online in the amount of the Pro Hac Vice fee set forth in the District Court
Schedule of Fees (due upon application)

4. Petitioner is admitted to the following courts:

State of Wisconsin (Bar #1038835). State of New York (Reg. #5890306). Federal District Courts: EDWI; WDWI; and EDMO.
Federal Courts of Appeal: Fourth and Seventh Circuits.

5. Since such admission(s), petitioner has practiced in the following courts:

Wisconsin State Courts. Federal District Courts: EDWI, WDWI, and EDMO. Federal Courts of Appeal: Fourth and Seventh Circuits.

and has been involved in the following professional activities:

Professional writing and teaching.

6. Please respond separately to each of the following questions:

- (a) Have you ever been held in contempt of court? ☐ Yes ☒ No
(b) Have you ever been sanctioned by a court? ☐ Yes ☒ No
(c) Have you ever been publicly censured, admonished, advised, or cautioned in a disciplinary proceeding? ☐ Yes ☒ No
(d) Have you ever been suspended or disbarred by any court? ☐ Yes ☒ No
(e) Have you ever been denied admission or readmission to the Bar of any court? ☐ Yes ☒ No
(f) Are you now the subject of any pending disciplinary proceeding OR the subject of any pending disciplinary complaint before any court? ☐ Yes ☒ No

In the case of each affirmative answer to a question set forth above, the applicant shall file a confidential statement under seal disclosing the identity of the responsible court or disciplinary committee, as well as the date, background, outcome and any facts of a mitigating or exculpatory nature as may be pertinent. Such confidential statement, together with the petition, shall promptly be transmitted by the Clerk to the Chief Judge of the District for review.

7. That petitioner has read and is familiar with the provisions of Title 28 of the United States Code which pertains to jurisdiction of and venue in a United States District Court, the Federal Rules of Civil and Criminal Procedures, the Federal Rules of Evidence, the Local Rules of Practice for the United States District Court for the Western District of New York, the Code of Professional Responsibility as adopted by the Appellate Division of the State of New York and as interpreted and applied by the United States Supreme Court, the United States Court of Appeals for the Second Circuit, and this Court.

WHEREFORE, the petitioner respectfully requests to be admitted as an attorney in the United States District Court for the Western District of New York.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: December 11, 2023
(Date)


(Signature of Petitioner)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

IN THE MATTER OF THE APPLICATION OF

Lewis Beilin

(Name of Petitioner)

TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

SPONSORING
AFFIDAVIT

STATE OF NEW YORK)
) ss:
COUNTY OF ERIE)

Christopher L. Boyd

Name of Sponsor

, being duly sworn deposes and says:

1. I reside at: 254 Norwood Avenue, Buffalo, NY 14222

City, State

and maintain an office for the practice of law at: New York Office of the Attorney General, 350 Main Place Tower,
Suite 300A, Buffalo, NY 14202

2. I am an attorney at law, admitted to practice in the State of New York

_____, I was admitted to practice in the United States District Court for the
Western District of New York on the 30th day of March, 2015.

3. I have known the petitioner since October 13, 2022, and under the following

circumstances: Mr. Beilin has been a participant in the investigation
and drafting leading to the filing of this case.

4. I know the following about the petitioner's moral character and fitness to be admitted to practice in this Court: _____

Mr. Beilin has acted ethically during all of our interactions.

He is a committed and skillful advocate for consumers' rights.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 1/8/24

Date

Christopher L Boyd

Signature of Sponsoring Attorney

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ATTORNEY'S OATH

STATE OF WISCONSIN)
DANE) SS:
COUNTY)

I, Lewis W. Beilin of Madison, Wisconsin
City, State

do solemnly swear or affirm that I will demean myself, as an attorney and counselor of the United States District Court for the Western District of New York, uprightly and according to law; and I will support the Constitution of the United States. So help me God.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: December 11, 2023
Date


Signature of Attorney

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

APPENDIX TO CIVILITY PRINCIPLES

OATH OF OFFICE

I do solemnly swear (or affirm):

I will support the Constitution of the United States and the Constitution of the State of New York; I will maintain the respect due to Courts of Justice and judicial officers;

I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense that I do not believe to be honestly debatable under the law of the land;

In maintaining the causes confided to me, I will employ only means that are honorable, and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidences and preserve inviolate the secrets of my client, and will accept compensation solely from the client or a third-party with the knowledge and approval of the client;

I will abstain from all offensive behavior and advance no fact prejudicial to the honor and reputation of a party or witness, unless my ethical duty requires;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed upon members of the bar who practice law in this State and before this Court.

A handwritten signature in cursive script, appearing to read "David Bilal", is written over a horizontal line.

(Signature)

UNITED STATES DISTRICT COURT

Western District of New York

ATTORNEY DATABASE & ELECTRONIC CASE FILING REGISTRATION FORM

The Clerk's Office maintains a database of attorneys admitted in the District. To ensure the data we enter for you is correct, please fill out the form below and submit it with your other papers when you are admitted. Our local rules require you to report changes to your name, firm affiliation, office address, email, and/or phone number within 30 days.

This form shall also be used to register for an account on the Courts' Case Management/Electronic Files (CM/ECF) system. Registered attorneys will have privileges to electronically submit and to view the electronic docket sheets and documents. By registering, attorneys consent to receiving electronic notice of filings through the system. The following information is required for registration.

Instructions: PLEASE TYPE OR PRINT. If you use two surnames or have a hyphenated surname, please indicate how you would like the name entered into our records, i.e., first surname as middle name, both surnames in last name field, etc.

Check One: ☒ New Registration ☐ Update Address/Email/Phone

First Name: Lewis

Middle Name or Initial: W.

Last Name: Beilin

Firm Name: Wisconsin Department of Justice

Firm Address: 17 West Main Street

Post Office Box 7857

Suite: _____

City: Madison State: WI Zip: 53707 - 7857

Phone Number: 608 - 266 - 3076 FAX Number: 608 - 294 - 2907

Primary E-Mail Address: beilinlw@doj.state.wi.us

Additional E-Mail Address(es) to receive notices: burrba@doj.state.wi.us

Attorneys seeking to file documents electronically must be admitted to practice in the United States District Court for the Western District of New York.

Method of Admission: pro hac vice

(Petition, Certificate of Good Standing, *pro hac vice*)

Date admitted to practice in this Court: pending

(write "pending" if admission is pending)

If admitted pro hac vice:

Date motion for pro hac vice granted: _____ in case number: _____

Government attorneys do not need to seek admission. United States Attorneys, Assistant United States Attorneys, special attorneys appointed under 28 U.S.C. §§ 515 and 543, Federal Public Defenders, Assistant Federal Public Defenders, and any attorney employed by a federal agency, may practice before this Court on any matter within the scope of their employment by submitting to the Clerk of Court this Electronic Case Filing Registration Form and filing a notice of appearance as required by Local Rule of Civil Procedure 83.2(b).

By submitting this registration form, the undersigned agrees to abide by all Court rules, orders and policies and procedures governing the use of the electronic filing system. The undersigned also consents to receiving notice of filings pursuant to Fed. R. Civ. P. 5(b) and 77(d) via the Court's electronic filing system. The combination of user id and password will serve as the signature of the attorney filing the documents.

Attorneys must protect the security of their passwords and immediately notify PACER and the court if they learn that their password has been compromised.



Signature of Registrant

December 11, 2023

Date

Please note that this form is required to be completed by any attorneys seeking to be admitted to this District and submitted with the admission application. If you have been previously admitted to practice in this court and need to update your contact information or are a government attorney submitting this registration to request an account or, you may email the form to CMECF_Support@nywd.uscourts.gov, or mail it to the following address:

Mary C. Loewenguth
United States District Court
Attn: CM/ECF Registration
2 Niagara Square
Buffalo, New York 14202